

Appl. No. 10/510,546  
Amdt. Dated  
Reply to Office action of January 18, 2007  
Attorney Docket No. P16816-US2  
EUS/J/P/07-1128

### **REMARKS/ARGUMENTS**

#### **1.) Claim Amendments**

Claims 32, 33, 49, 50 and 79 have been amended; no new matter has been added. Claims 32-97 remain pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

#### **2.) Claim Rejections – 35 U.S.C. §112**

The Examiner rejected claims 32-34, 36, 49-51 and 79 as being indefinite. The Applicant has amended claims 32, 33, 49, 50 and 79 to more particularly point out and distinctly claim the subject matter that Applicant regards as the invention. The Examiner's consideration of those amended claims is respectfully requested.

With respect to the Examiner's assertion that claim 32 is poorly phrased with commas making the "identifying" limitation unclear, the Applicant believes the amendment to delete "whenever possible" will make the limitation more understandable. That limitation now reads: "identifying, based on predetermined connection information, further connection information that in combination with said predetermined connection information defines . . . ." Thus, what is identified is "further connection information," which is identified based on "predetermined connection information." The Examiner's reconsideration of claim 32, in view of the amendments, is respectfully requested.

The Examiner also questions, with respect to the limitation "partially complete gateway state representation" in claims 34 and 51, "[h]ow a state can be partially complete especially when it is a representation." As one of ordinary skill in the art will understand, based on a reading of Applicant's specification and general knowledge of the art, a "partially complete gateway state representation" is a representation of a gateway state, but the representation is not yet complete because some information is missing. According to Applicant's invention, the missing information will be available upon receipt of a packet from an inside/outside node and will be added to the partially complete gateway state representation, thereby transferring the *partially complete*

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gateway state representation to a *complete* gateway state representation. The Examiner's reconsideration of claims 34 and 51, in view of this clarification, is respectfully requested.

### 3.) Claim Rejections – 35 U.S.C. §102(e)

The Examiner rejected claims 32-97 as being anticipated by Brustoloni, *et al.* (U.S. Patent No. 6,886,103). The Applicant traverses the rejections.

First, it is to be remembered that anticipation requires that the disclosure of a single piece of prior art reveals every element, or limitation, of a claimed invention. Furthermore, the limitations that must be met by an anticipatory reference are those set forth in each statement of function in a claims limitation, and such a limitation cannot be met by an element in a reference that performs a different function, even though it may be part of a device embodying the same general overall concept. Whereas Brustoloni fails to anticipate each and every limitation of claims 32-97, those claims are not anticipated thereby.

Claim 32 recites:

32. A method for supporting establishment of a connection between a node of an inside address realm and a node of an outside address realm through an intermediate communication gateway having a limited number of available outside-realm gateway addresses for enabling outside-realm representation of inside-realm nodes, said method comprising the steps of:

identifying, based on predetermined connection information, further connection information that in combination with said predetermined connection information defines an outside-realm gateway state representation that has no counterpart in a predetermined set of existing gateway connection states, wherein said predetermined connection information includes at least one of network address information and port information of at least one of said inside-realm node and said outside-realm node and said further connection information includes an outside-realm gateway address; and

initiating establishment of said connection based on said outside-realm gateway state representation. (emphasis added)

The Applicant's invention solves a problem related to establishment of a connection between a node of an inside address realm and a node of an outside address realm

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through an intermediate communication gateway having a limited number of available outside-realm gateway addresses for enabling outside-realm representation of inside-realm nodes. In the prior art, such as Brustoloni, the problem is address using Network Address Translation (NAT). Identifying according to NAT (and Brustoloni) is made using the outside-realm address of the router or gateway and the port number of the router or gateway. According to claim 32, however, this is accomplished using more information than is used according to known solutions. The sources of the additional information are "predetermined connection information" and "further connection information." "Further connection information" includes an outside-realm gateway address, which is known from Brustoloni and NAT. "Predetermined connection information" includes network address information and/or port information of at least one of the inside-realm node and the outside-realm node. Neither the address information of the inside realm node nor the address information of the outside realm node, however, is disclosed in Brustoloni or the known prior art relating to NAT. The result of the combination of "predetermined connection information" and "further connection information," according to Applicant's invention, is an outside-realm gateway state representation, which is more than an address and a port identification as it is in Brustoloni because the "outside-realm gateway state representation" includes both the "further connection information," known from the prior art, and the "predetermined connection information," which is novel. Furthermore, Brustoloni does not disclose the limitation of initiating establishment of a connection based on the "outside-realm gateway state representation," because that state representation, as defined by the limitations of claim 32, includes address information elements that are not taught by the prior art.

Therefore, whereas Brustoloni fails to teach each and every limitation of claim 32, that claim is not anticipated. Furthermore, whereas independent claims 49 and 79 recites limitations analogous to those of claim 32, they are also not anticipated by Brustoloni. Moreover, whereas claims 33-48, 50-78 and 80-97 are dependent from claims 32, 49 and 79, respectively, and include the limitations thereof, those claims are also not anticipated.

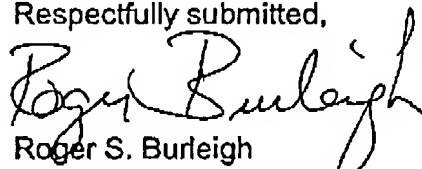
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### CONCLUSION

In view of the foregoing amendments and remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 32-97.

The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

  
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